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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEVADA**

WP 6 RESTAURANT MANAGEMENT
GROUP, LLC

Plaintiff,

v.

ZURICH AMERICAN INSURANCE
COMPANY,

Defendant.

CASE NO. 2:20-cv-01506-KJD-NJK
ORDER GRANTING
**MOTION TO EXTEND TIME TO FILE
VERIFIED PETITIONS FOR
PERMISSION TO PRACTICE IN THIS
CASE AND DESIGNATION OF LOCAL
COUNSEL**

(First Request)

Plaintiff WP 6 Restaurant Management Group, LLC (“Wolfgang Puck”), by and through its counsel of record, submits this Motion to Extend Deadline to File Verified Petitions for Permission to Practice in This Case and Designation of Local Counsel (the “Verified Petitions”). In light of the events outside of counsel's control, additional time is necessary to obtain certain documents needed

1 for the Verified Petitions. This is Wolfgang Puck's first request for an extension of time on this
2 subject and will not impact any other deadlines.

3 This Motion is made and based on the papers and pleadings on file herein, the following
4 Memorandum of Points and Authorities, any and all exhibits thereto, and any and all oral argument
5 this Court may allow at the time of hearing of this matter.

6 DATED this 31st day of August, 2020.

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MEMORANDUM OF POINTS AND AUTHORITIES

In accordance with Local Rule IA 6-1, this is Wolfgang Puck's first request to extend the deadline to submit the Verified Petitions, and the deadline for submitting the Verified Petitions has not yet passed.

On August 17, 2020, this Court entered the Notice to Counsel Pursuant to Local Rule IA 11-2 to counsel John N. Ellison, Esq. and Richard P. Lewis, Esq. [Dkt. No. 3], setting out a deadline of August 31, 2020 to submit the Verified Petitions.

According to Local Rule IA 11- 2(b)(3), an attorney must attach to the verified petition a "certification issued within six months before the date of filing of the verified petition that the applicant's membership is in good standing from the state bar or from the clerk of the supreme court or highest admitting court of every state, territory, or insular possession of the United States in which the applicant has been admitted to practice law." Mr. Lewis is admitted to practice law in the States of New York and California, and the District of Columbia. Although Mr. Lewis sought a Certificate of Good Standing from all three jurisdictions in a timely manner, to date, Mr. Lewis has only received a Certificate of Good Standing from New York and the District of Columbia. Due to delays in processing, Mr. Lewis expects to receive the Certificate of Good Standing from California beyond the August 31, 2020 deadline to submit his Verified Petition. Also, with the challenges associated with remote working, additional time is needed to obtain the notarized signatures for both Verified Petitions.

"A motion or stipulation to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR IA 6-1, be supported by a showing of good cause for the extension." LR 26-3. Here, good cause exists to extend the deadline to submit the Verified Petitions. Due to the matters outside of counsel's control, and despite diligent efforts, the California Certificate of Good Standing has yet to be received and the notarized signatures are in process.

1 To allow sufficient time to obtain the required certificate and notarized signatures,
2 Wolfgang Puck respectfully requests that the deadline to submit the Verified Petitions be extended
3 14 days, to Monday, September 14, 2020, a date by which counsel reasonably expects to receive all
4 required documents and signatures.

5 DATED this 31st day of August, 2020.

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25 *Group, LLC*

26 **IT IS SO ORDERED:**

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28 _____
UNITED STATES DISTRICT JUDGE

DATED: January 21, 2021

(nunc pro tunc)

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